

**Louisiana Department of Environmental Quality (LDEQ)**  
**Office of Environmental Services**

**STATEMENT OF BASIS**

Graphic Packaging International Inc  
West Monroe Mill #31  
West Monroe, Ouachita Parish, Louisiana  
Agency Interest Number: 1432  
Activity Number: PER20050001  
Proposed Permit Number: 2160-00001-V3

**I. APPLICANT**

**Company:**

Graphic Packaging International Inc  
PO Box 35800  
West Monroe, Louisiana 71294-5800

**Facility:**

West Monroe Mill #31  
1000 Jonesboro Rd  
West Monroe, Ouachita Parish, Louisiana  
Approximate UTM coordinates are 579.66 kilometers East and 3594.17  
kilometers North, Zone 15

**II. FACILITY AND CURRENT PERMIT STATUS**

The West Monroe Mill is an integrated pulp and paper mill that converts raw wood to unbleached wood pulp, which is used to produce finished products of coated paperboard, linerboard, corrugated medium, and bag paper. The mill is divided into the following areas based on process sequences: woodyard, pulp mill, recovery, powerhouse, causticizing, paper machines, coatings and additives, and wastewater treatment (L07001).

Logs and chips are brought into the woodyard, stored in piles, and then conveyed to the digesters in the pulp mill. Logs are also converted to chips in the woodyard section of the mill.

Wood chips are cooked in the digesters under elevated temperature and pressure in an alkaline solution of sodium sulfide and sodium hydroxide, referred to as "white liquor." During the cooking process, air trapped with the chips and gases formed during cooking are relieved intermittently. A turpentine condenser is used to recover marketable turpentine from these relief gases. Upon completion of the cooking cycle, the contents of the digester (consisting of the pulp and spent cooking liquor, or "black liquor") are transferred to a blow tank (L02025,

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L02026, and L02027), where temperature and pressure are returned to atmospheric levels. The gases leaving the blow tank pass through a blow heat accumulator tank to condense the moisture. The remaining uncondensed gases throughout the system, referred to as non-condensable gases (low volume high concentration [LVHC] or high volume low concentration [HVLC]) are collected and combusted. The balance of the pulp supply is produced from secondary fiber. The pulp is washed, screened, and sent to storage. A multiple effect evaporator line concentrates the weak black liquor from the pulp washing process. Tall oil soap is a byproduct of the process, which is acidified with sulfuric acid in a tall oil reactor (L03010) at the mill.

There are three kraft digesting lines (L02028, L02029, and L02030), two brownstock washing lines, and one diffusion washing line (L02001, L02002, and L02003, respectively) at the West Monroe mill. There is also one semi-chemical system (L02031 and L02004) at the West Monroe mill.

The spent solution (black liquor) generated during the pulping process is stored in a number of storage tanks, one of which is the 1,125,000 gallon No. 6 Black Liquor Tank (L03021). It is then evaporated and burned in the Nos. 4 and 5 Recovery Boilers (L03004/L03005 and L03007/L03008) to produce smelt for the purpose of recovering inorganic chemicals. Smelt is then dissolved in Recovery Boiler Nos. 4 and 5 Smelt Dissolving Tanks (L03006 and L03009) to form green liquor. The inorganic chemicals (primarily  $\text{Na}_2\text{CO}_3$ ) in green liquor are reacted with slaked lime to produce white liquor for use in the pulping process. The spent lime (lime mud) produced during the causticizing process is then calcined in the Lime Kilns Nos. 1 and 2 (L04002 and L04003) to produce lime ( $\text{CaO}$ ) for reuse in the causticizing process.

There are five paper machines (L05001-L05005) which convert the refined pulp into several grades of paper through conventional Fourdrinier dewatering, pressing, and drying. Paper produced at the West Monroe Mill includes coated paperboard, linerboard, corrugated medium, and bag paper. The coatings and additives section of the mill prepares and provides coating, starches, and "wet end" chemicals for use on the paper machines.

Bark from the logs and other types of biomass, in addition to natural gas, are used as fuel in the powerhouse Bark Boiler (L03003). The Bark Boiler (L03003) and the Nos. 1 and 2 Foster Wheeler Boilers (L03001 and L03002) provide steam for other mill production areas. The boilers each have a normal operating rate of 4,117,200 MMBtu per year. The HVLC gases are combusted in the Bark Boiler (L03003) for control. The Bark Boiler has a normal operating rate of 7,533,600 MMBtu per year. During periods when the Bark Boiler is down for maintenance, the No. 1 Foster Wheeler Boiler (L03001) is used as an alternate control device. The LVHC gases are combusted in the Bark Boiler (L03003) or in the No. 2 Lime Kiln (L04003).

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In this permit modification, the calculations for the paper machines (Emission Point ID L05002, L05003, L05004, and L05005) were reconciled in order to correctly utilize the emission factors used to determine their potential to emit. No modifications were made to the paper machines. The emissions changes do not reflect a physical change or a change in the method of operations.

This permit modification also addresses a reconciliation of the particulate matter emission rate for the Bark Boiler (L03003). In the previous permit modification, the particulate matter emission rate was based on a vendor guarantee of 0.06 lb/MMBTU. However, after a series of performance tests, it was determined that this emission rate was not achievable. This permit modification revises that particulate matter emission rate to 0.0972 lb/MMBTU. This emissions change does not reflect a physical change or a change in the method of operations.

In addition, this permit modification addresses a revised NSR analysis for the No. 4 Recovery Boiler Economizer/Generating Bank Project. This project was completed under the approval granted by Permit No. 2160-00001-V2. This permit modification proposes to revise the NSR analysis performed in support of this project in order to use more representative emissions data. The analysis shows that the emissions increase for all NSR pollutants due to this project, including sulfur dioxide, remains below the significance level.

Graphic Packaging International Inc - West Monroe Mill #31 is a designated Part 70 source. The Part 70 permit issuance history is as follows:

Permit No.	Unit or Source	Date Issued
2160-00001-V0	West Monroe Mill #31	10/17/2000
2160-00001-V1	West Monroe Mill #31	3/31/2003
2160-00001-V2 (current)	West Monroe Mill #31	9/27/2004

Graphic Packaging International also owns and operates the West Monroe Packaging Plant #70 (Agency Interest No. 39129) which adjoins the West Monroe Mill # 31. The packaging plant currently operates under Permit No. 2160-00008-V2, issued October 21, 2005.

### **III. PROPOSED PROJECT/PERMIT INFORMATION**

#### **Application**

A permit application was submitted on April 14, 2005 requesting a Part 70 operating permit for the West Monroe Mill #31. A revised application was submitted on June 15, 2007. Additional information dated July 24, 2007, August 15, 2007, September 7, 2007, September 24, 2007, October 5, 2007, October 22, 2007, December 19, 2007, January, 23, 2008, February 13, 2008, February 18,

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2008, February 25, 2008, February 27, 2008, and April 10, 2008, was also submitted.

**Project**

With this modification, Graphic Packaging requests the following changes:

- Revision of applicability tables.
- Reconciliation of emissions, emission points, administrative errors, and emission point descriptions
- Removal of the weekly visual inspection for opacity on the No. 4 Recovery Boiler (L03004/L03005) as required by Part 70 Specific Condition No. 2. Graphic Packaging operates a continuous opacity monitoring system (COMS) on the stack of this boiler as required by NESHAP Subpart MM.
- Update of VOC emissions for the Wastewater Treatment (L07001) to reflect the highest emission rate from the Condensate Treatment Compliance Test showing compliance with NESHAP Subpart S, for the previous eight quarters and a statistical analysis.
- Incorporation of the reestablished alternative monitoring parameters for the Wastewater Treatment Unit (Emission Point ID L07001) for the purpose of demonstrating compliance with the Cluster Rule condensate collection and treatment provisions (40 CFR Part 63, Subpart S).
- Routing High Volume, Low Concentration (HVLC) sources to the No. 1 Foster Wheeler Boiler (L03001), as an alternative control device, when the Bark Boiler is down for maintenance.
- Update to the Compliance Assurance Monitoring (CAM) plan for the Bark Boiler (L03003), Lime Kilns Nos. 1 and 2 (L04002 and L04003), and the Slaker and Lime Silo Scrubber (L04001). Only certain pollutants from these units are subject to CAM.
- Combustion of recycle oil in the Nos. 1 and 2 Lime Kilns (L04002 and L04003) and the installation of a recycle oil storage tank (L09010).
- Incorporate a permit shield for the No. 5 Recover Boiler (L03007 and L03008) and the No. 5 Smelt Dissolving Tank (L03009). This permit shield will allow the mill to show compliance with all applicable requirements of 40 CFR 60 Subpart BB through compliance with the more stringent 40 CFR 63 Subpart MM.

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**Proposed Permit**

Proposed Permit No. 2160-00001-V3 will be the renewal and modification of Part 70 Operating Permit No. 2160-00001-V2 for the West Monroe Mill #31.

**Permitted Air Emissions**

Estimated emissions in tons per year are as follows:

Pollutant	Before	After	Change
PM <sub>10</sub>	782.08	1067.67	+ 285.59
SO <sub>2</sub>	1601.80	2462.90	+ 861.10
NO <sub>x</sub>	3498.01	3653.40	+ 155.39
CO	4073.95	3654.94	- 419.01
VOC	1306.38	3614.42	+ 2308.04
TRS	227.21	317.84	+ 90.63

**IV REGULATORY ANALYSIS**

The applicability of the appropriate regulations is straightforward and provided in the Specific Requirements section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the proposed permit.

**Applicability and Exemptions of Selected Subject Items**

ID No:	Requirement	Notes
UNF001 - West Monroe Mill # 31	Chemical Accident Prevention and Minimization of Consequences [LAC 33:III.Chapter 59]	DOES NOT APPLY. The facility does not emit any of the pollutants listed in Table 59.0. [LAC 33:III.5907.A]
EQT099, EQT0100, EQT0101	Emissions Standards for Particulate Matter [LAC 33:III.1301.B]	EXEMPT. Wood pulping industry is exempt per LAC 33:III.1301.B. [LAC 33:III.1301.B]
	Compliance Assurance Monitoring for Major Stationary Sources [40 CFR 64.1]	DOES NOT APPLY. The cyclone operates as inherent process equipment. The cyclone on the chip bin is part of the process design feature of the pneumatic conveyance of chips. [40 CFR 64.1]
ARE003, ARE004	Emissions Standards for Particulate Matter [LAC 33:III.1301.B]	EXEMPT. Wood pulping industry is exempt per LAC 33:III.1301.B. [LAC 33:III.1301.B]

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ID No:	Requirement	Notes
ARE006	Compliance Assurance Monitoring for Major Stationary Sources [40 CFR 64.2(b)(1)(i)]	EXEMPT. These sources are subject to NESHAP – Subpart S and therefore exempt from CAM requirements.[40 CFR 64.2(b)(1)(i)]
EQT0102, EQT0103, EQT0117, EQT0118, EQT0119, EQT0123, EQT0124, EQT0126, EQT0127, EQT0129, EQT0130, EQT0131, EQT0132, EQT0133, EQT0134, EQT0197	Compliance Assurance Monitoring for Major Stationary Sources [40 CFR 64.2(b)(1)(i)]	EXEMPT. These sources are subject to NESHAP – Subpart S and therefore exempt from CAM requirements. [40 CFR 64.2(b)(1)(i)]
EQT0104	NSPS Subpart BB – Standards for Performance of Kraft Pulp Mills [40 CFR 60.280(a)]	DOES NOT APPLY. Diffusion Washer Systems are excluded from the list of affected facilities under NSPS – Subpart BB. [40 CFR 60.280(a)]
	Compliance Assurance Monitoring for Major Stationary Sources [40 CFR 64.2(b)(1)(i)]	EXEMPT. These sources are subject to NESHAP – Subpart S and therefore exempt from CAM requirements. [40 CFR 64.2(b)(1)(i)]
EQT0105, EQT0116, EQT0126, EQT0127, EQT0128, EQT0129, EQT0130, EQT0131, EQT0132, EQT0133, EQT0134	NSPS Subpart BB – Standards for Performance of Kraft Pulp Mills [40 CFR 60.280(b)]	EXEMPT. These sources have not been constructed or modified since September 24, 1976. [40 CFR 60.280(b)]
EQT0115	Storage of Volatile Organic Compounds [LAC 33:III.2103.A&B]	EXEMPT. Tank does not store volatile organic compounds with a true vapor pressure of 1.5 psia or greater. [LAC 33:III.2103.A&B]

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EQT0155 (continued)	NSPS Subpart K - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110(a)]	DOES NOT APPLY. Tank does not store petroleum liquids. [40 CFR 60.110(a)]
	NSPS Subpart Ka - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110a(a)]	DOES NOT APPLY. Tank does not store petroleum liquids. [40 CFR 60.110a(a)]
	NSPS Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.110b(a)]	EXEMPT. Tank has not been constructed, reconstructed, or modified after July 23, 1984. [40 CFR 60.110b(a)]
EQT0135, EQT0136	Emissions Standards for Particulate Matter [LAC 33:III.1301.B]	EXEMPT. Wood pulping industry is exempt per LAC 33:III.1301.B. [LAC 33:III.1301.B]
	Emission Standards for Sulfur Dioxide [LAC 33:III.1513.C]	EXEMPT. Because the source is not subject to the limitations of LAC 33:III.1503.C, the permittee shall record and retain at the site sufficient data to show the annual SO2 emissions from the source. [LAC 33:III.1503.C]
	Waste Gas Disposal [LAC 33:III.2115]	DOES NOT APPLY. The vent gas from this combustion source is not classified as a waste gas stream. [LAC 33:III.2115.M]
	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5105.B.3(a)&(b)]	EXEMPT. The requirements of LAC 33:III.Chapter 51 do not apply when the boilers are combusting Group 1 or Group 2 virgin fossil fuels. [LAC 33:III.5105.B.3(a)&(b)]
	NSPS Subpart D - Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction Is Commenced After August 17, 1971 [40 CFR 60.40(c)]	EXEMPT. The boilers have not been constructed or modified after August 17, 1971. [40 CFR 60.40(c)]

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EQT0135, EQT0136 (continued)	NSPS Subpart Da - Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978 [40 CFR 60.40a(a)]	DOES NOT APPLY. The boilers are not electric steam generating units. [40 CFR 60.40a(a)]
	NSPS Subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units [40 CFR 60.40b(a)]	EXEMPT. The boilers have not been constructed, reconstructed, or modified after June 19, 1984. [40 CFR 60.40b(a)]
	NSPS Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units [40 CFR 60.40c(a)]	EXEMPT. The boilers have not been constructed, reconstructed, or modified after June 9, 1989. [40 CFR 60.40c(a)]
EQT0137	Emissions Standards for Particulate Matter [LAC 33:III.1301.B]	EXEMPT. Wood pulping industry is exempt per LAC 33:III.1301.B. [LAC 33:III.1301.B]
	NSPS Subpart Da - Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978 [40 CFR 60.40a(a)]	DOES NOT APPLY. The boiler is not an electric steam generating unit. [40 CFR 60.40a(a)]
	NSPS Subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units [40 CFR 60.40b(a)]	EXEMPT. The boiler has not been constructed, reconstructed, or modified after June 19, 1984. [40 CFR 60.40b(a)]
	NSPS Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units [40 CFR 60.40c(a)]	EXEMPT. The boiler has not been constructed, reconstructed, or modified after June 9, 1989. [40 CFR 60.40c(a)]
EQT0138, EQT0139	Emissions Standards for Particulate Matter [LAC 33:III.1301.B]	EXEMPT. Wood pulping industry is exempt per LAC 33:III.1301.B. [LAC 33:III.1301.B]
	NSPS Subpart D - Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction Is Commenced After August 17, 1971 [40 CFR 60.40(c)]	DOES NOT APPLY. The boiler is not a fossil fuel-fired steam generating unit. Fossil fuel firing is necessary for proper black liquor combustion. Therefore the subpart is not applicable to the boiler as per memorandum from John S. Seltz, EPA, dated June 15, 1990. [40 CFR 60.40(c)]



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EQT0138, EQT0139 (continued)	NSPS Subpart Da – Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978 [40 CFR 60.40a(a)]	DOES NOT APPLY. The boiler is not an electric steam generating unit. [40 CFR 60.40a(a)]
	NSPS Subpart Db – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units [40 CFR 60.40b(a)]	EXEMPT. The boiler has not been constructed, reconstructed, or modified after June 19, 1984. [40 CFR 60.40b(a)]
	NSPS Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units [40 CFR 60.40c(a)]	EXEMPT. The boiler has not been constructed, reconstructed, or modified after June 9, 1989. [40 CFR 60.40c(a)]
	NSPS Subpart BB – Standards of Performance for Kraft Pulp Mills [40 CFR 60.280(b)]	EXEMPT. The boiler has not been constructed, reconstructed, or modified after September 24, 1976. [40 CFR 60.280(b)]
	Compliance Assurance Monitoring for Major Stationary Sources [40 CFR 64.2(b)(1)(i)]	EXEMPT. These sources are subject to NESHAP – Subpart MM and therefore exempt from CAM requirements. [40 CFR 64.2(b)(1)(i)]
EQT0140	Emission Standards for Sulfur Dioxide [LAC 33:III.1513.C]	EXEMPT. Because the source is not subject to the limitations of LAC 33:III.1503.C, the permittee shall record and retain at the site sufficient data to show the annual SO2 emissions from the source. [LAC 33:III.1503.C]
	Storage of Volatile Organic Compounds [LAC 33:III.2103.B]	DOES NOT APPLY. Tank does not meet the definition of storage tank. [LAC 33:III.2103.B]
	NSPS Subpart BB – Standards of Performance for Kraft Pulp Mills [40 CFR 60.280(b)]	EXEMPT. The boiler has not been constructed, reconstructed, or modified after September 24, 1976. [40 CFR 60.280(b)]
	Compliance Assurance Monitoring for Major Stationary Sources [40 CFR 64.2(b)(1)(i)]	EXEMPT. This source is subject to NESHAP – Subpart MM and therefore exempt from CAM requirements. [40 CFR 64.2(b)(1)(i)]
EQT0141, EQT0142	Emissions Standards for Particulate Matter [LAC 33:III.1301.B]	EXEMPT. Wood pulping industry is exempt per LAC 33:III.1301.B. [LAC 33:III.1301.B]

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EQT0141, EQT0142 (continued)	Control of Emissions for Specific Industries: Subchapter A. Chemical Woodpulp Industry [LAC 33:III.2301]	EXEMPT. Subject to requirements of 40 CFR 60, Subpart BB--Standards of Performance for Kraft Pulp Mills. [LAC 33:III.2301.E]
	NSPS Subpart D - Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction Is Commenced After August 17, 1971 [40 CFR 60.40(c)]	DOES NOT APPLY. The boiler is not a fossil fuel-fired steam generating unit. Fossil fuel firing is necessary for proper black liquor combustion. Therefore the subpart is not applicable to the boiler as per memorandum from John S. Seltz, EPA, dated June 15, 1990. [40 CFR 60.40(c)]
	NSPS Subpart Da - Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978 [40 CFR 60.40a(a)]	DOES NOT APPLY. The boiler is not an electric steam generating unit. [40 CFR 60.40a(a)]
	NSPS Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units [40 CFR 60.40c(a)]	EXEMPT. The boiler has not been constructed, reconstructed, or modified after June 9, 1989. [40 CFR 60.40a(a)]
	Compliance Assurance Monitoring for Major Stationary Sources [40 CFR 64.2(b)(1)(i)]	EXEMPT. These sources are subject to NESHAP - Subpart MM and therefore exempt from CAM requirements. [40 CFR 64.2(b)(1)(i)]
EQT0143	Emission Standards for Sulfur Dioxide [LAC 33:III.1513.C]	EXEMPT. Because the source is not subject to the limitations of LAC 33:III.1503.C, the permittee shall record and retain at the site sufficient data to show the annual SO2 emissions from the source. [LAC 33:III.1503.C]
	Storage of Volatile Organic Compounds [LAC 33:III.2103.B]	DOES NOT APPLY. Tank does not meet the definition of storage tank. [LAC 33:III.2103.B]
	Control of Emissions for Specific Industries: Subchapter A. Chemical Woodpulp Industry [LAC 33:III.2301]	EXEMPT. Subject to requirements of 40 CFR 60, Subpart BB--Standards of Performance for Kraft Pulp Mills. [LAC 33:III.2301.E]
	Compliance Assurance Monitoring for Major Stationary Sources [40 CFR 64.2(b)(1)(i)]	EXEMPT. This source is subject to NESHAP - Subpart MM and therefore exempt from CAM requirements. [40 CFR 64.2(b)(1)(i)]

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EQT0144	Compliance Assurance Monitoring for Major Stationary Sources [40 CFR 64.2(a)(3)]	DOES NOT APPLY. The source does not emit pre-controlled emissions greater than 100 TPY. [40 CFR 64.2(a)(3)]
EQT0145, EQT0146, EQT0147, EQT0148, EQT0149, EQT0150, EQT0151, EQT0153, EQT0154, EQT0155, EQT0156, EQT0198, EQT0199	Storage of Volatile Organic Compounds [LAC 33:III.2103.A &B]	EXEMPT. Tank does not store volatile organic compounds with a true vapor pressure of 1.5 psia or greater. [LAC 33:III.2103.A&B]
	NSPS Subpart K - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110(a)]	DOES NOT APPLY. Tank does not store petroleum liquids. [40 CFR 60.110(a)]
	NSPS Subpart Ka - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110a(a)]	DOES NOT APPLY. Tank does not store petroleum liquids. [40 CFR 60.110a(a)]
	NSPS Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.110b(a)]	EXEMPT. Tank has not been constructed, reconstructed, or modified after July 23, 1984. [40 CFR 60.110(a)]
EQT0157	Storage of Volatile Organic Compounds [LAC 33:III.2103.A &B]	EXEMPT. Tank does not store volatile organic compounds with a true vapor pressure of 1.5 psia or greater. [LAC 33:III.2103.A&B]
	NSPS Subpart K - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110(a)]	DOES NOT APPLY. Tank does not store petroleum liquids. [40 CFR 60.110(a)]

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EQT0157 (continued)	NSPS Subpart Ka - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110a(a)]	DOES NOT APPLY. Tank does not store petroleum liquids. [40 CFR 60.110a(a)]
	NSPS Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.110b(a)]	EXEMPT. The vapor pressure of the tank contents is less than 3.5 kPa (0.51 psia). [40 CFR 60.110(a)]
EQT0160, EQT0161, EQT0162	Storage of Volatile Organic Compounds [LAC 33:III.2103.A &B]	EXEMPT. Tank does not store volatile organic compounds with a true vapor pressure of 1.5 psia or greater. [LAC 33:III.2103.A&B]
	NSPS Subpart K - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110(a)]	DOES NOT APPLY. Tank does not store petroleum liquids. [40 CFR 60.110(a)]
	NSPS Subpart Ka - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110a(a)]	DOES NOT APPLY. Tank does not store petroleum liquids. [40 CFR 60.110a(a)]
	NSPS Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.110b(a)]	EXEMPT. Tank has not been constructed, reconstructed, or modified after July 23, 1984. [40 CFR 60.110b(a)]
EQT0164	Emissions Standards for Particulate Matter [LAC 33:III.1301.B]	EXEMPT. Wood pulping industry is exempt per LAC 33:III.1301.B. [LAC 33:III.1301.B]
EQT0165, EQT0166	Emissions Standards for Particulate Matter [LAC 33:III.1301.B]	EXEMPT. Wood pulping industry is exempt per LAC 33:III.1301.B. [LAC 33:III.1301.B]

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EQT0165, EQT0166  (continued)	Emission Standards for Sulfur Dioxide [LAC 33:III.1513.C]	EXEMPT. Because the source is not subject to the limitations of LAC 33:III.1503.C, the permittee shall record and retain at the site sufficient data to show the annual SO2 emissions from the source. [LAC 33:III.1503.C]
	NSPS Subpart BB – Standards of Performance for Kraft Pulp Mills [40 CFR 60.280(b)]	EXEMPT. The lime kilns have not been constructed, reconstructed, or modified after September 24, 1976. [40 CFR 60.280(b)]
EQT0174, EQT0177	Organic Solvents [LAC 33:III.2123.C]	DOES NOT APPLY. These paper machines do not use organic solvents that are photochemically reactive as defined in LAC 33:III.2123.B.1. [LAC 33:III.2123.B.1]
EQT0175, EQT0178, EQT0180	Organic Solvents [LAC 33:III.2123.C]	DOES NOT APPLY. The materials used in the on-machine coating are not organic solvents because of the low VOC content of the water based mixture, which is well below the 20% threshold defined in LAC 33:III.2123.B.1 for organic solvents which are not considered photochemically reactive. The materials used in the on-machine coating is part of the substrate and therefore not considered surface coating of paper under LAC 33:III.2123.C.4. [LAC 33:III.2123.B.1&C.4]
	NESHAP Subpart JJJJ – Paper and Other Web Coating [40 CFR 63.3290]	DOES NOT APPLY. In a letter dated November 19, 2003, from Michael Alushin, Director of Compliance Assessment and Media Programs Division; the EPA determined that on-machine coaters that apply materials used to form a substrate (i.e. the paperboard) are not subject to NESHAP Subpart JJJJ. GPI's uses water based clays, titanium dioxide, synthetic pigment, starch, and latex which were the materials reviewed by EPA in making this determination. [40 CFR 63.3290]
EQT0176, EQT0179, EQT0181	Emission Standards for Sulfur Dioxide [LAC 33:III.1513.C]	EXEMPT. Because the source is not subject to the limitations of LAC 33:III.1503.C, the permittee shall record and retain at the site sufficient data to show the annual SO2 emissions from the source. [LAC 33:III.1503.C]

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EQT0182, EQT0183, EQT0184, EQT0185, EQT0186, EQT0187	Emissions Standards for Particulate Matter [LAC 33:III.1301.B]	EXEMPT. Wood pulping industry is exempt per LAC 33:III.1301.B. [LAC 33:III.1301.B]
	Compliance Assurance Monitoring for Major Stationary Sources [40 CFR 64.2(a)(3)]	DOES NOT APPLY. The source does not emit pre-controlled emissions greater than 100 TPY. [40 CFR 64.2(a)(3)]
EQT0188	Emissions Standards for Particulate Matter [LAC 33:III.1301.B]	EXEMPT. Wood pulping industry is exempt per LAC 33:III.1301.B. [LAC 33:III.1301.B]
EQT0189	Emissions Standards for Particulate Matter [LAC 33:III.1301.B]	EXEMPT. Wood pulping industry is exempt per LAC 33:III.1301.B. [LAC 33:III.1301.B]
	Organic Solvents [LAC 33:III.2123.C]	DOES NOT APPLY. The materials used in the on-machine coating are not organic solvents because of the low VOC content of the water based mixture, which is well below the 20% threshold defined in LAC 33:III.2123.B.1 for organic solvents which are not considered photochemically reactive. This source makes the water based coating applied on the on-line coaters that is part of the substrate. [LAC 33:III.2123.B.1]
EQT0190	Limiting VOC Emissions From Industrial Wastewater [LAC 33:III.2153.C]	DOES NOT APPLY. Source is not located in one of the parishes affected by this regulation. [LAC 33:III.2153.A]
EQT0191, EQT0192, EQT0193, EQT0194	NESHAP Subpart Q – Industrial Process Cooling Towers [40 CFR 63.400(a)]	DOES NOT APPLY. Cooling towers do not use chromium based water treatment chemicals. [40 CFR 63.400(a)]
	Compliance Assurance Monitoring [40 CFR 64.1]	DOES NOT APPLY. Mist eliminators on the cooling towers are inherent process equipment and not control devices.
EQT0195	NSPS Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110(a)]	DOES NOT APPLY. Storage capacity of tank is less than 40,000 gallons. [40 CFR 60.110(a)]

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EQT0195 (continued)	NSPS Subpart Ka - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110a(a)]	DOES NOT APPLY. Storage capacity of tank is less than 40,000 gallons. [40 CFR 60.110a(a)]
	NSPS Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.110b(a)]	DOES NOT APPLY. Storage capacity of tank is less than 75 m <sup>3</sup> . [40 CFR 60.110b(a)]
EQT0196	Storage of Volatile Organic Compounds [LAC 33:III.2103.B]	EXEMPT. Storage tank does not contain any volatile organic compound having a true vapor pressure of 1.5 psia or greater: [LAC 33:III.2103.B]
	NSPS Subpart K - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110(a)]	EXEMPT. The tank has not been constructed, reconstructed or modified after June 11, 1973 and prior to May 19, 1978. [40 CFR 60.110(a)]
	NSPS Subpart Ka - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110a(a)]	EXEMPT. The tank has not been constructed, reconstructed or modified after May 18, 1978 and prior to July 23, 1984. [40 CFR 60.110a(a)]
EQT0201	Emissions Standards for Particulate Matter [LAC 33:III.1301.B]	EXEMPT. Wood pulping industry is exempt per LAC 33:III.1301.B. [LAC 33:III.1301.B]
	Emission Standards for Sulfur Dioxide [LAC 33:III.1513.C]	EXEMPT. Because the source is not subject to the limitations of LAC 33:III.1503.C, the permittee shall record and retain at the site sufficient data to show the annual SO <sub>2</sub> emissions from the source. [LAC 33:III.1503.C]

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EQT0201 (continued)	NESHAP Subpart ZZZZ - National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines [40 CFR 63.6590(a)(1)(ii)]	EXEMPT. The temporary compressors are existing compression ignition stationary RICE with site-ratings lower than 500 bhp and were constructed or reconstructed before July 12, 2006. [40 CFR 63.6590(a)(1)(ii)]
	NSPS Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	EXEMPT. Engines have not been modified or reconstructed after July 11, 2005 [40 CFR 63.4200(a)(3)]
EQT0203	Storage of Volatile Organic Compounds [LAC 33:III.2103.A]	EXEMPT. Storage tank does not contain any volatile organic compound having a true vapor pressure of 1.5 psia or greater. [LAC 33:III.2103.A]
	NSPS Subpart K - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110(a)]	EXEMPT. The tank has not been constructed, reconstructed or modified after June 11, 1973 and prior to May 19, 1978. [40 CFR 60.110(a)]
	NSPS Subpart Ka - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110a(a)]	EXEMPT. The tank has not been constructed, reconstructed or modified after May 18, 1978 and prior to July 23, 1984. [40 CFR 60.110a(a)]
	NSPS Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.110b(a)]	DOES NOT APPLY. The tank has a storage capacity greater than 151m <sup>3</sup> (39,889.98 gallons), but does not store a liquid with a maximum true vapor pressure less than 3.5 kPa (0.5 psia). Pursuant to Vol. 68, No.199 published October 15, 2003 of Fed. Reg. 592329, the Environmental Protection Agency (EPA) exempted storage vessels with a capacity equal to or greater than 151m <sup>3</sup> storing liquid with vapor pressure less than 3.5 kPa from the recordkeeping requirements of subpart Kb.

The initial compliance determination requirements of 40 CFR 63.865 for the No. 4 Recovery Boiler (EQT0138 and EQT0139), No. 5 Recover Boiler (EQT0141 and EQT0142), No. 5 Recovery Boiler Smelt Dissolving Tank (EQT0143), and Lime Kiln No. 1 (EQT0165), and Lime Kiln No. 2 (EQT0166) were satisfied on September 23, 2005.



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**MACT Requirements**

West Monroe Mill #31 is a major source of toxic air pollutants and must address maximum achievable control technology (MACT) pursuant to the requirements of LAC 33:III.Chapter 51.

The following table lists the Class I, II, and III TAPs emitted from the West Monroe Mill #31 and the West Monroe Packaging Plant #70 (Agency Interest No. 39129) along with their corresponding Minimum Emission Rate (MER). All sources which emit any Class I or Class II TAPs must meet Maximum Achievable Control Technology (MACT) according to LAC 33:III.5109.A. MACT for these sources is described in the applicable NESHAP standards listed in Section XI. Table 1 and the Specific Requirements section of this permit. All Class I, II, or III TAPs emitted from the West Monroe Mill #31 above the MER shall determine the status of compliance with the Ambient Air Standards (AAS) according to LAC 33:III.5109.B.

<b>LAC 33:III.Chapter 51 Toxic Air Pollutants (TAPS)</b>	<b>Class</b>	<b>MER (lb/yr)</b>	<b>MER (TPY)</b>	<b>Annual Emission Rate (TPY)</b>	<b>Greater Than or Equal to MER?</b>
Acrylonitrile	I	35.0	0.0175	0.15	Yes
Arsenic (and compounds)	I	25.0	0.0125	0.032	Yes
Benzene	I	260.0	0.13	1.71	Yes
Beryllium (and compounds)	I	25.0	0.0125	0.072	Yes
Cadmium (and compounds)	I	25.0	0.0125	0.018	Yes
Chromium VI (and compounds)	I	25.0	0.0125	0.039	Yes
Formaldehyde	I	260.0	0.13	7.64	Yes
Nickel (and compounds)	I	25.0	0.0125	0.115	Yes
Vinyl chloride	I	240.0	0.12	0.06	No
Acetaldehyde	II	700.0	0.35	150.86	Yes
Acrolein	II	25.0	0.0125	4.183	Yes
Acrylamide	II	25.0	0.0125	0.035	Yes
Aniline	II	600.0	0.30	0.01	No
Antimony (and compounds)	II	37.5	0.01875	0.016	No
Barium (and compounds)	II	37.5	0.01875	1.229	Yes
Carbon disulfide	II	2,400.0	1.20	1.20	Yes
Carbon tetrachloride	II	83.5	0.04175	1.02	Yes
Chlorinated dibenzo-p-dioxins	II	0.0001	5.0E-8	0.0002	Yes
Chlorinated dibenzo furans	II	0.0001	5.0E-8	0.00001	Yes
Chlorobenzene	II	25.0	0.0125	0.044	Yes
Chloroform	II	69.5	0.03475	2.10	Yes
Chloroprene	II	2,700.0	1.35	0.02	No
Copper (and compounds)	II	25.0	0.0125	0.158	Yes
Dibutyl phthalate	II	380.0	0.19	0.25	Yes
1,4-Dichlorobenzene	II	20,000.0	10.00	0.02	No

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<b>LAC 33:III.Chapter 51 Toxic Air Pollutants (TAPS)</b>	<b>Class</b>	<b>MER (lb/yr)</b>	<b>MER (TPY)</b>	<b>Annual Emission Rate (TPY)</b>	<b>Greater Than or Equal to MER?</b>
1,2-Dichloroethane	II	48.5	0.02425	0.019	No
Dichloromethane	II	540.0	0.27	3.88	Yes
Ethyl acrylate	II	1,500.0	0.75	1.10	Yes
Ethyl benzene	II	20,000.0	10.00	0.13	No
Glycol ethers	II	1,200.0	0.60	40.90	Yes
Manganese (and compounds)	II	75.0	0.0375	3.02	Yes
Mercury (and compounds)	II	25.0	0.0125	0.017	Yes
Naphthalene	II	1,990.0	0.995	3.66	Yes
Phenol	II	1,400.0	0.70	1.95	Yes
Polynuclear aromatic hydrocarbons	II	25.0	0.0125	2.208	Yes
Selenium (and compounds)	II	25.0	0.0125	0.011	No
Styrene	II	2,000.0	1.00	32.28	Yes
Tetrachloroethylene	II	2,800.0	1.40	0.61	No
1,1,2-Trichloroethane	II	4,000.0	2.00	0.21	No
Trichloroethylene	II	900.0	0.45	4.00	Yes
Xylene (mixed isomers)	II	20,000.0	10.00	3.73	No
Ammonia	III	1,200.0	0.60	306.18	Yes
n-Butyl alcohol	III	11,000.0	5.50	1.27	No
Chlorine	III	100.0	0.05	0.01	No
Cresol	III	1,600.0	0.80	1.66	Yes
Cumene	III	18,000.0	9.00	1.84	No
Ethylene glycol	III	9,000.0	4.50	0.06	No
n-Hexane	III	13,000.0	6.50	10.47	Yes
Hydrochloric acid	III	500.0	0.25	33.97	Yes
Hydrofluoric acid	III	63.0	0.03	0.16	No
Hydrogen sulfide	III	1,000.0	0.50	119.69	Yes
Methanol	III	20,000.0	10.00	1,346.17	Yes
Methyl ethyl ketone	III	20,000.0	10.00	14.09	Yes
Methyl isobutyl ketone	III	15,000.0	7.50	3.57	No
Propionaldehyde	III	700.0	0.35	4.96	Yes
Sulfuric acid	III	75.0	0.0375	16.03	Yes
Toluene	III	20,000.0	10.00	2.75	No
1,1,1-Trichloroethane	III	20,000.0	10.00	0.26	No
Vinyl acetate	III	2,600.0	1.30	64.75	Yes
Zinc (and compounds)	III	200.0	0.10	1.60	No

Sources which combust Group 1 virgin fossil fuels are exempt from the provisions of Subchapter A of LAC 33:III.Chapter 51, per LAC 33:III.5105.B.2.a. Sources which combust wood residue fuels are exempt from the provisions of LAC 33:III.5109, per LAC 33:III.5105.B.7

The West Monroe Mill #31 is subject to the following NSPS and NESHAP regulations:

- NSPS – Subpart D – Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction Is Commenced After August 17, 1971

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- NSPS – Subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
- NSPS – Subpart BB – Standards of Performance for Kraft Pulp Mills
- NSPS – Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
- NESHAP – Subpart S – National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry
- NESHAP – Subpart MM – National Emission Standards for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills

**Air Quality Analysis**

Dispersion Model(s) Used: ISCST3

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Quality Standard or (National Ambient Air Quality Standard {NAAQS})
Acrolein	8-hour	4.009	5.4
Chromium VI	Annual	0.002	0.01
PAH	Annual	0.006	0.06
Sulfuric Acid	8-hour	0.311	23.8

**General Condition XVII Activities**

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to the Section VIII – General Condition XVII Activities of the proposed permit.

**Insignificant Activities**

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the proposed permit.

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**IV. PERMIT SHIELD**

Per 40 CFR 70.6(f), permit shields have been proposed as delineated in the following table:

<b>Emissions Source</b>	<b>Proposes to be Shielded From ...</b>	<b>... by compliance with ...</b>	<b>Was the Permit Shield Granted?</b>
Bark Boiler (L03003)	LAC 33:III.1101.B	40 CFR 60 Subpart D	No
	Permit No. PSD-LA-37	40 CFR 60 Subpart D	No
	LAC 33:III.2301.D.1.d	40 CFR 60 Subpart D	No
No. 4 Recover Boiler (L03004 and L03005)	LAC 33:III.2301.D.4	40 CFR 63 Subpart MM	No
	LAC 33:III.2301.D.1	40 CFR 63 Subpart MM	No
No. 4 Smelt Dissolving Tank (L03006)	LAC 33:III.2310.D.1.b	40 CFR 63 Subpart MM	No
No. 5 Recovery Boiler (L03007 and L03008)	40 CFR 60 Subpart BB	40 CFR 63 Subpart MM	Yes
	LAC 33:III.2301.D.1	40 CFR 63 Subpart MM	No
No. 5 Smelt Dissolving Tank (L03009)	40 CFR 60 Subpart BB	40 CFR 63 Subpart MM	Yes
Lime Kiln No. 1 (L04002)	LAC 33:III.1101.B	40 CFR 63 Subpart MM	No
	LAC 33:III.2301.D.1.c	40 CFR 63 Subpart MM	No
Lime Kiln No. 2 (L04003)	LAC 33:III.1101.B	40 CFR 63 Subpart MM	No
	Permit No. PSD-LA-37	40 CFR 63 Subpart MM	No
	LAC 33:III.2301.D.1.c	40 CFR 63 Subpart MM	No

Compliance with 40 CFR 63 Subpart MM for the No. 5 Recovery Boiler (L03003 and L03008) and the No. 5 Smelt Dissolving Tank (L03009), including the monitoring, recordkeeping, and reporting requirements of 40 CFR 63 Subpart MM, constitutes compliance with 40 CFR 60 Subpart BB for the No. 5 Recovery Boiler (L03003 and L03008) and the No. 5 Smelt Dissolving Tank (L03009), including operations during periods of startup and shutdown. The requirements of 40 CFR 63 Subpart MM are federally applicable requirements that are more stringent than and overlapping with the 40 CFR 63 Subpart BB requirements.

GPI also requested other permit shields that were not granted. These requests are delineated in the above table. Regulations that originate from 40 CFR 60 are not generally applicable during startup, shutdown, and malfunction per 40 CFR 60.8(c). Regulations that originate from 40 CFR 63 are not generally applicable during startup, shutdown, and malfunction per 40 CFR 63.6(f). LAC 33:III.1101B, LAC 33:III.2301, and requirements imposed by the Prevention of Significant Deterioration (PSD) program apply at all times, including startup and shutdown. These regulations are more stringent than the 40 CFR 60 and 40 CFR 63 regulations during startup and shutdown events. As a result, a permit shield was not granted.

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**V. PERIODIC MONITORING**

**Compliance Assurance Monitoring**

Federal regulation 40 CFR 64 Compliance Assurance Monitoring (CAM) is applicable to this facility. Applicability for each pollutant requires that the unit be subject to an emission limitation and must use an active control device to achieve compliance. The following emission sources with pollution control equipment have a pre-control emission rate of a pollutant over 100 tons per year and were determined to require a CAM Plan: Bark Boiler (L03003), Slaker and Lime Silo Scrubber (L04001), Lime Kiln No. 1 (L04002), and Lime Kiln No. 2 (L04003). SO<sub>2</sub> and particulate matter (PM) are the regulated pollutants for the Bark Boiler. PM is the regulated pollutant for the Slaker and Lime Silos. SO<sub>2</sub> and Total Reduced Sulfur (TRS) are the regulated pollutants for Lime Kilns Nos. 1 and 2.

The scrubber for the Bark Boiler is used to reduce SO<sub>2</sub> and TRS emissions associated with the combustion of LVHC and HLVC gases. The monitoring of the pH, the flow rate, and the supply pressure of the scrubbing liquid ensures that SO<sub>2</sub> and TRS emissions are being controlled. These parameters will be monitored and recorded continuously when burning low volume, high concentration (LVHC) gases from PCS002. The pH, scrubber flow, and scrubber supply pressure indicator ranges that assure compliance will be determined through an initial performance test.

The scrubber for the Bark Boiler is used to reduce PM emissions associated with the combustion of wood. The monitoring of the flow rate and the supply pressure of the scrubbing liquid as well as the differential pressure (dp) across the scrubber ensures that PM emissions are being controlled. These parameters will be monitored and recorded continuously when burning wood. The dp, scrubber flow, and scrubber supply pressure indicator ranges that assure compliance will be determined through an initial performance test.

The scrubber for the Slaker and Lime Silos (L04001) is used to collect and reduce particulate emissions associated with the handling and housing of lime at the facility. The monitoring of scrubber flow ensures that particulate emissions are being controlled. The flow rate of the scrubbing liquid will be monitored and recorded daily. The minimum scrubber flow that assures compliance will be determined through an initial performance test.

The scrubber for Lime Kiln No. 1 (L04002) is used to collect and reduce sulfur dioxide and total reduced sulfur emissions associated with the combustion of various fuels. The monitoring of the pH, the flow rate, and the supply pressure of the scrubbing liquid ensures that SO<sub>2</sub> and TRS emissions are being controlled. These parameters will be monitored and recorded continuously when burning low volume, high concentration (LVHC) gases from PCS002 in conjunction with recycle oil. These parameters will be recorded daily otherwise. The pH, scrubber flow, and scrubber supply pressure indicator ranges that assure compliance will be determined through an initial performance test.

The scrubber for Lime Kiln No. 2 (L04003) is used to collect and reduce sulfur dioxide and total reduced sulfur emissions associated with the combustion of

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various fuels. The monitoring of the pH, the flow rate, and the supply pressure of the scrubbing liquid ensures that SO<sub>2</sub> and TRS emissions are being controlled. These parameters will be monitored and recorded continuously when burning low volume, high concentration (LVHC) gases from PCS002 in conjunction with recycle oil. These parameters will be recorded daily when burning recycle oil alone or when burning LVHC gases in conjunction with natural gas. The pH, scrubber flow, and scrubber supply pressure indicator ranges that assure compliance will be determined through an initial performance test.

Upon determining the appropriate indicator ranges, Graphic Packaging shall submit an administrative amendment to include the appropriate ranges as described above.

## **VI. GLOSSARY**

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Maximum Achievable Control Technology (MACT) – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

Hydrogen Sulfide (H<sub>2</sub>S) – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

New Source Review (NSR) – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C (“Prevention of Significant Deterioration of Air Quality”) and D (“Nonattainment New Source Review”).

Nitrogen Oxides (NO<sub>x</sub>) – Compounds whose molecules consist of nitrogen and oxygen.

Organic Compound – Any compound of carbon and another element. Examples: Methane (CH<sub>4</sub>), Ethane (C<sub>2</sub>H<sub>6</sub>), Carbon Disulfide (CS<sub>2</sub>)

Part 70 Operating Permit – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: ≥ 10 tons per year of any toxic air pollutant; ≥ 25 tons of total toxic air pollutants; and ≥ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

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PM<sub>10</sub> – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide (SO<sub>2</sub>) – An oxide of sulfur.

Sulfuric Acid (H<sub>2</sub>SO<sub>4</sub>) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III.Chapter 51.

Title V Permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than those, which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.